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U. S. DISTRICT COURT
MID. DIST. TENN.
FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.

NOV 16 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

Derrick F. Peppers

Name of Plaintiff

v.

Stephens pipe and
steel

Name of Defendant(s)

Case No.

(To be assigned by Clerk)

Jury Demand Yes No

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, and the Civil Rights Act of 1991, for employment discrimination. Jurisdiction is specifically conferred upon the Court by 42 U.S.C. § 2000e-5, or, if the Plaintiff is a federal employee, by 42 U.S.C. § 2000e-16. Relief is sought under 42 U.S.C. § 2000e-5(g) and/or 42 U.S.C. § 1981a(b).

2. Plaintiff, Derrick Peppers, is a citizen of the United States and resides at

209 Tailway Circle, Madison,
Street address City

Davidson, Tn, 37207, 615-568-5172
County State Zip Code Telephone Number

3. Defendant, Stephens pipe & steel resides at, or its business is located at

500 Myrtle Drive, Madison,
Street address City

Davidson, Tn, 37115.
County State Zip Code

(If more than one Defendant, list the name and address of each additional Defendant)

4. Plaintiff sought employment from the Defendant or was employed by the Defendant at

508 Myatt Dr., Davidson
Street address City
Davidson, TN, 37115.
County State Zip Code

5. Defendant discriminated against Plaintiff in the manner indicated in paragraphs 8 and 9 of this Complaint on or about Oct 13 2013.
Month Day Year

6. Plaintiff filed charges against the Defendant with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission charging the Defendant with the acts of discrimination indicated in paragraphs 8 and 9 of this Complaint on or about
Nov 12 2013.
Month Day Year

7. The Equal Employment Opportunity Commission or the United States Department of Justice issued a Notice of Right to Sue which was received by Plaintiff on Oct
21 2015, a copy of which Notice is attached.
Month Day Year

8. Because of Plaintiff's (1) X race, (2) X color, (3) _____ sex,
(4) _____ religion, (5) _____ national origin, the Defendant:

- a. _____ failed to employ Plaintiff.
- b. terminated Plaintiff's employment.
- c. _____ failed to promote Plaintiff.
- d. _____ retaliated against Plaintiff for having filed a charge of discrimination.
- e. _____ other. Explain: through out my employment at stephens pipe & steel
it was made to endure racial slurs and
treated differently when i firstly address this
i was fired
9. The circumstances under which Defendant discriminated against Plaintiff were as follows:

constant remarks of being the token
on projects made to work late while
others could leave made to work
under conditions that other employees
where not.

(You may use additional paper, if necessary.)

10. The acts set forth in paragraph 8 of this Complaint:

- a. _____ are still being committed by Defendant.
- b. _____ are no longer being committed by Defendant.
- c. may still be being committed by Defendant.

11. Plaintiff attaches to this Complaint a copy of the charges filed with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission, which charges are submitted as a brief statement of the facts supporting this Complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief:

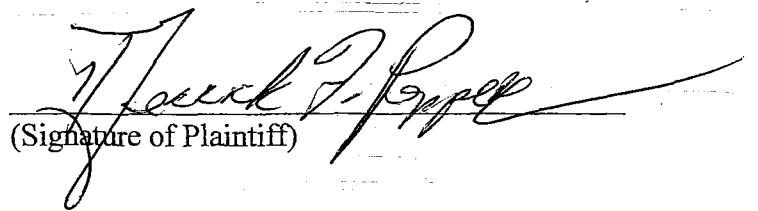
- a. _____ direct that Defendant employ Plaintiff, or
b. _____ direct that Defendant re-employ Plaintiff, or
c. _____ direct that Defendant promote Plaintiff, or
d. D order other equitable or injunctive relief: _____

e. _____ direct that Defendant pay Plaintiff back pay in the amount of

_____ and interest on back pay;

f. _____ direct that Defendant pay Plaintiff compensatory damages: Specify
the amount and basis for compensatory damages: _____

g. R direct that Defendant pay Plaintiff punitive damages in the amount of
250,000 because Defendant engaged in a discriminatory practice or
practices with malice or with reckless indifference to Plaintiff's federally protected rights,
as described in paragraphs 8 and 9 above; and that the Court grant such other relief as may
be appropriate, including costs and attorney's fees.


(Signature of Plaintiff)